

# **EXHIBIT A**

Denise Bonnici  
9/11/2013

Page 48

- 1 Q. Right. How many dribbles or how much Pine Sol was on  
2 the floor that you saw after you fell?
- 3 A. I'd say just little puddles.
- 4 Q. How many puddles?
- 5 A. I didn't sit there and count them. I laid there. I was  
6 crying. I was upset. I couldn't tell you.
- 7 Q. More than a few? More than three?
- 8 A. Sir, I can't answer that.
- 9 Q. Well, you said -- I'm just trying to get to understand  
10 what you saw. You said there were a couple.
- 11 A. Yes.
- 12 Q. A couple is two or three; is that fair?
- 13 A. That's what I seen.
- 14 Q. There may have been more?
- 15 A. There may have been more. It was very hard to see until  
16 I was laying on the ground.
- 17 Q. How many -- how big were these puddles? Were they -- I  
18 know you're on video, but just so the court reporter can  
19 take it down, would that be about five or six inches in  
20 diameter?
- 21 A. Yes, sir, and I was watching where I was going. I was  
22 watching the floor. I didn't see it.
- 23 Q. After you were on the floor and you were looking down  
24 and you looked at it, could you tell it was Pine Sol?
- 25 A. Yes, I could smell it.

Denise Bonnici  
9/11/2013

Page 50

1 Pine Sol bottle was all of the Pine Sol out of the  
2 bottle or was there still some in the bottle?

3 A. I can't -- I don't know. I was hurting so bad and  
4 freaking out, I thought I broke my back.

5 Q. I understand. I just have to ask the questions. You  
6 may or may not remember.

7 MS. STOLLER: If you don't remember you can  
8 say you don't remember.

9 A. I don't remember.

10 MR. FRANCIS: I just have to ask the  
11 questions, okay. I don't remember what I ate for lunch  
12 yesterday, so I don't expect you to remember everything.

13 MS. STOLLER: It's okay if you don't remember.

14 BY MR. FRANCIS:

15 Q. You didn't see anybody break the bottle?

16 A. No.

17 Q. You have no information as to how the bottle got broken?

18 A. No.

19 Q. Do you have any information as to how long the bottle or  
20 Pine Sol had been on the floor?

21 A. No.

22 Q. And you just stated that you believe that the gentleman  
23 from the store didn't even know it was there?

24 A. Correct.

25 Q. How far was the gentleman or the greeter from the bottle



Denise Bonnici  
9/11/2013

Page 52

1 A. Yes.

2 Q. Fair to say that after you fell and you looked you were  
3 able to figure out what it was that you fell on?

4 A. That's when I saw something wet on the floor and then I  
5 could smell it.

6 Q. And --

7 A. Because looking down I couldn't see it.

8 Q. Have you bought Pine Sol before?

9 A. No, I don't use it.

10 Q. Have you used it?

11 A. I don't like it.

12 Q. You've seen it though before; right?

13 A. Yes.

14 Q. And it's brown; correct?

15 A. Correct.

16 Q. Is that yes?

17 A. I guess it's brown.

18 MS. STOLLER: We don't want you to guess.

19 Only answer if you know. If you don't know, say you  
20 don't know.

21 A. I don't know. I don't use that product. I don't like  
22 the smell of it.

23 BY MR. FRANCIS:

24 Q. But you've seen it before?

25 A. Yes.